

To: California Division of Oil and Gas and Geothermal Resources (DOGGR)

Re: Public Comments to modifications to REQUIREMENTS FOR CALIFORNIA UNDERGROUND GAS STORAGE PROJECTS, TEXT OF PROPOSED REGULATIONS, CALIFORNIA CODE OF REGULATIONS, TITLE 14, CHAPTER 4. DEVELOPMENT, REGULATION, AND CONSERVATION OF OIL AND GAS, RESOURCES, Subchapter 1. Onshore Well Regulations, Article 4. Requirements for Underground Gas Storage Projects, 1726.3. Risk Management Plans.

From: Geologic Maps Foundation, Inc. (GMF), Ventura, CA, February 27, 2018;
www.geologicmapsfoundation.org

General Comment: Inviting public comments on the geologic hazards at the Aliso Canyon gas storage field, such as the Santa Susana fault, is premature as the Aliso Canyon Gas Storage Field Geologic, Seismologic and Geomechanical Studies funded by SoCalGas have not been released for public review and comment.

Specific Comment Regarding 1726.3 Risk Management Plans (d) (2) (L), pg 6/23: Deletion of active faults is not recommended: The “seismicity” hazard, which remains in the modified text, does not incorporate the fault-displacement hazard posed by the shearing of high-pressure gas storage wells that cross an active, or in some definitions capable fault (capable of generating a damaging earthquake) during an earthquake on the fault. The “seismicity” hazard refers to the threat to well integrity posed by shaking from any nearby earthquake and all of the underground gas storage fields in seismically active California are at risk to that hazard. Aliso Canyon, and probably Honor Rancho, are unique gas storage field settings where all of the wells at the fields cross faults, the Santa Susana and Honor Rancho faults respectively, that have large total displacements and high late-Quaternary slip rates. The potential threat posed by casing shearing along these geologically young faults and the uniqueness of the settings will be diminished by deleting “active faults” from the new regulations. For a more detailed discussion of this issue with key references, please visit:

<http://geologicmapsfoundation.org/publications.html>

My concerns about the fault-displacement hazard at the Aliso Canyon storage field and the objectivity and transparency of the evaluation and review process to date are summarized in the journal **Science** (3 NOVEMBER 2017 • VOL 358 ISSUE 6363):

http://geologicmapsfoundation.org/resources/Science_3Nov2017_EvaluatingFaultLinesinAliso_v358_issue6363_p601.pdf

Respectfully,



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